

**REMARKS**

Claims 15-22, 24 and 25 are pending in this application. Claims 1, 6, 7, 9, 13 and 23 are canceled without prejudice to, or disclaimer of, the subject matter of those claims. Reconsideration of the application in view of the above amendments and the following remarks is respectfully requested.

The Office Action rejects claim 23 under 35 U.S.C. §112, second paragraph, as being indefinite. The cancellation of claim 23 renders this rejection moot.

The Office Action rejects claims 1, 6, 7, 9, 13 and 23 under 35 U.S.C. §103(a) as being unpatentable over Japanese Patent Publication No. 2002-281435 to Murakami in view of U.S. Patent No. 5,862,218 to Steinberg. The cancellation of the above enumerated claims renders the above rejection moot.

The Office Action rejects claims 15-22, 24, and 25 under 35 U.S.C. §103(a) as being unpatentable over Murakami in view of U.S. Patent Application Publication No. 2002/0051140 to Yamada, and further in view of U.S. Patent No. 6,888,569 to Fox et al. (hereinafter "Fox") and Steinberg. Applicant respectfully traverses this rejection.

First, the Office Action asserts that Steinberg teaches an image compression unit that generates compressed data by executing image compression, as positively recited in the pending claims. This assertion is incorrect. Specifically, Steinberg fails to teach, nor would it have suggested, generating compressed data by executing image compression, as recited above. Steinberg only discloses a mark lookup table that contains the address and pixel color values for each pixel replaced according to the indicium. Further, Steinberg teaches that a mark lookup table may be prepared that contains the address and pixel color values for each pixel replaced according to the indicium, as discussed in col. 4, lines 12-14. Here, a table is created which references pixels in an image and the corresponding characteristics of the reference pixels. The data corresponding to the original image is not a block of image data or

a mass of image data, as disclosed in col. 4, lines 12-14 and as shown in Fig. 11 of Steinberg. This generation of a reference table cannot reasonably be considered to teach, nor would it have suggested, generating compressed data by executing image compression, as positively recited in the pending claims. Steinberg teaches the generation of reference tables, and fails to teach, nor would it have suggested, generating compressed data by executing image compression as positively recited in the pending claims.

Second, the data of the mark lookup table cannot be readily reproduced. In Steinberg, the references to pixel information contained in the mark lookup table must first be converted to pixel information before processing. Replacement cannot be completed only by replacing the indicium with the mark lookup table stored in the image header. Therefore, as Steinberg teaches using mark lookup references tables to reference pixel information, Steinberg cannot reasonably be considered to teach setting an image plane range corresponding to an image portion of the image data, selecting data corresponding to the image plane range from the compressed data based upon the RST marker codes, extracting the selected data as data of the image portion, storing the data of the processed image into a frame, which is an image area of the JPEG file and is referenced as image data, and storing the data of the image portion into an application segment, which is a non-image area of the JPEG file and is not referenced as image data, as positively recited in the pending claims.

Third, the Office Action relies on the discussion of encryption in Steinberg, combined with the discussion of compression in Yamada, in order to reject the subject matter of the pending claims. However, the asserted combination discussed above is incorrect. Specifically, with respect to Steinberg's lack of discussion regarding image compression, the references of Steinberg and Yamada cannot reasonably be combined to arrive at the subject matter of the pending claims, as Steinberg teaches a mark lookup table that cannot be compressed using image compression. In other words, the mark lookup table of Steinberg

cannot be suitable for data compression because the data corresponding to the original image is not a block of image data or a mass of image data, but is instead address data for each pixel as disclosed in col. 4, lines 12-14 of Steinberg, and as further shown in Fig. 11. Therefore, as the data of the table shown in Fig. 11 cannot reasonably be considered to correspond to image data, and is not suitable for data compression, it would not have been obvious to one of ordinary skill in the art to combine Steinberg and Yamada.

Murakami and Fox fail to overcome the deficiencies as discussed above.

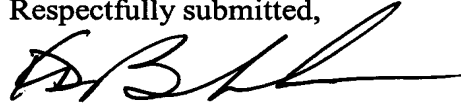
As Steinberg and Yamada cannot reasonably be combined, as discussed above, and Steinberg does not teach the data of the image portion is stored into the application segment, the combination of Steinberg and Yamada cannot reasonably be considered to teach, nor would they have suggested, the combination of features as positively recited in independent claims 15 and 16. Additionally, claims 17-22, 24 and 25 are also allowable at least for their dependence on allowable independent claims 15 and 16, as well as for the separately patentable subject matter that each of these claims recites.

Accordingly, reconsideration and withdrawal of the pending rejections of the Office Action are respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 15-22, 24 and 25 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff  
Registration No. 27,075

Kirk D. Berkheimer  
Registration No. 59,874

JAO:ARK/mef

Date: February 28, 2008

**OLIFF & BERRIDGE, PLC**  
**P.O. Box 320850**  
**Alexandria, Virginia 22320-4850**  
**Telephone: (703) 836-6400**

**DEPOSIT ACCOUNT USE  
AUTHORIZATION**

Please grant any extension  
necessary for entry;  
Charge any fee due to our  
Deposit Account No. 15-0461